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## VIA FACSIMILE AND U.S. MAIL

September 27, 2007

Ms. Velma Smith, Branch Chief Branch of Filer Support 2, Mailstop 1-4 Securities and Exchange Commission 450 Fifth Street, N.W., Room #1004 Washington, D.C. 20549 RECEIVED

SEP 2 7 2007

The Division of Investment Management

Re:

Realty Funds, Inc.—Original Listing

Dear Ms. Smith:

Please be advised that NYSE Regulation, Inc. has received (on September 21, 2007) an application from the above-referenced issuer and has approved the following securities for listing on NYSE Arca, Inc. ("Exchange"):

Adelante Shares RE Growth<sup>TM</sup> Exchange-Traded Fund Adelante Shares RE Value<sup>TM</sup> Exchange-Traded Fund Adelante Shares RE Classics<sup>TM</sup> Exchange-Traded Fund Adelante Shares RE Kings<sup>TM</sup> Exchange-Traded Fund Adelante Shares RE Yield Plus<sup>TM</sup> Exchange-Traded Fund Adelante Shares RE Shelter<sup>TM</sup> Exchange-Traded Fund Adelante Shares RE Composite<sup>TM</sup> Exchange-Traded Fund

The Exchange requests acceleration of registration of these securities under the Securities Exchange Act of 1934. Please acknowledge receipt of this letter by stamping the enclosed copy with the date received and returning it in the self-addressed envelope. If there are any questions, please call me at (312) 442-7832. Your assistance is greatly appreciated.

Sincerely,

Craix A Gray

ead Analyst-Listing Compliance

Enclosure

PROCESSED

SEP 28 2007

THOMSON FINANCIAL

cc: Brian F. Hurley, Esq., Paul, Hastings, Janofsky & Walker LLP, 75 East 55th Street, New York, New York 10022

